

1 XAVIER BECERRA
Attorney General of California
2 WILLIAM C. KWONG
Supervising Deputy Attorney General
3 ANNE E. WADDELL, State Bar No. 311388
NECULAI GRECEA, State Bar No. 307570
4 PREETI K. BAJWA, State Bar No. 232484
Deputy Attorneys General
5 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
6 Telephone: (415) 703-1179
Fax: (415) 703-5843
7 E-mail: Preeti.Bajwa@doj.ca.gov
Attorneys for Defendants S. Cupp,
8 *J. Vangilder, and J. Vasquez*

9 JEFFREY R. RIEGER, State Bar No. 215855
BRITT M. ROBERTS, State Bar No. 284805
10 Reed Smith, LLP
101 2nd Street, Suite 1800
11 San Francisco, CA 94105
Telephone: (415) 659-4873
12 Fax: (415) 391-8269
E-mail: broberts@reedsmith.com
13 *Attorneys for Plaintiff Daniel Cisneros*

14 GERALD SINGLETON, State Bar No. 208783
BRODY A. MCBRIDE, State Bar No. 270852
15 Singleton Law Firm
115 W. Plaza Street
16 Solana Beach, CA 92075-1123
Telephone: (760) 697-1330
17 Fax: (760) 697-1329
E-mail: brody@slffirm.com
18 *Attorneys for Plaintiff Daniel Manriquez*

19
20 IN THE UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22

23 **DANIEL CISNEROS,**

24 Plaintiff,

25 v.

26 **J. VANGILDER, et al.,**

27 Defendants.
28

Case No. 4:16-cv-00735-HSG

**STIPULATION AND ~~PROPOSED~~
ORDER TO USE ELECTRONIC
EQUIPMENT**

Judge: Hon. Haywood S. Gilliam, Jr.
Trial Date: June 19, 2019
Action Filed: February 12, 2016

DANIEL MANRIQUEZ,

Plaintiff,

v.

J. VANGILDER, et al.,

Defendants.

Case No. 4:16-cv-01320-HSG

Action Filed: November 29, 2016

Pursuant to the Civil Pretrial and Trial Standing Order for Cases Before District Judge Haywood S. Gilliam, Jr., Plaintiffs Daniel Manriquez and Daniel Cisneros, and Defendants Cupp, Vangilder, and Vasquez hereby stipulate and seek permission to use electronic equipment at the trial scheduled to begin on June 19, 2019, and for the duration of the jury selection and at trial. The parties further request permission to have delivered miscellaneous carts, boxes, and binders of paper documents for use at trial. If the Court approves this request, pursuant to the instructions in the Civil Pretrial and Trial Standing Order, the parties will work with the Courtroom Deputy to arrange a convenient time and date for the delivery, installation, and testing of such equipment on or about the week of June 10, 2019.

The audio-visual display equipment and other items the parties seek permission to use follows:

- 4 computers;
- 2 iPads;
- A/V Table;
- 20" monitor;
- 2-way distribution amplifier;
- Speakers;
- Various power strips and VGA and power cabling and extension cords;
- Power Point remote;
- Laser pointers;
- External hard drives;
- Further miscellaneous carts, boxes, and binders;

- Large flipcharts / poster boards.

This equipment will aid in the organization and presentation of the parties' respective cases and allow for a more efficient presentation of evidence.

DATED: June 10, 2019

/s/ Preeti K. Bajwa
PREETI K. BAJWA
Deputy Attorney General
Attorney for Defendants
S. Cupp, J. Vangilder, and J. Vasquez

DATED: June 10, 2019

/s/ Britt M. Roberts
BRITT M. ROBERTS
Reed Smith, LLP
Attorney for Plaintiff Daniel Cisneros

DATED: June 10, 2019

/s/ Brody A. McBride
BRODY A. MCBRIDE
Singleton Law Firm
Attorney for Plaintiff Daniel Manriquez

ATTORNEY ATTESTATION

Pursuant to the Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the signatory indicated by a "conformed" signature (/s/) within this e-filed document.

DATED: June 10, 2019

/s/ Preeti K. Bajwa
PREETI K. BAJWA

1 **[PROPOSED] ORDER**

2 Pursuant to stipulation, it is ORDERED that on or about the week of June 10, 2019,
3 through the close of trial, counsel for Plaintiffs and Defendants, or their assistants or vendors, will
4 be allowed to bring the following equipment into the Federal Courthouse located at 1301 Clay
5 Street, Oakland, CA 94612, and set up in the courtroom of the Honorable Haywood S. Gilliam,
6 Jr., which will be in **Courtroom 2 on the 4th Floor**:

- 7 • 4 computers;
8 • 2 iPads;
9 • A/V Table;
10 • 20" monitor;
11 • 2-way distribution amplifier;
12 • Speakers;
13 • Various power strips and VGA and power cabling and extension cords;
14 • Power Point remote;
15 • Laser pointers;
16 • External hard drives;
17 • Further miscellaneous carts, boxes, and binders;
18 • Large flipcharts / poster boards.

19 Court staff, including assistant U.S. Marshalls on duty at the time, are directed to allow
20 and take such steps as are readily necessary to facilitate the foregoing activity.

21 **IT IS SO ORDERED.**

22
23 Dated: 6/11/2019

24 
The Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge